

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

-----X	
STACEY GALPERIN, MIRIAM ROCEK,	:
HANNAH SHAFFER, HEIDI SHAFFER,	:
and MARLENE DEVONSHIRE, as the	:
Natural Guardian of MEGHAN DEVONSHIRE	:
	:
Plaintiffs,	:
v.	:
	:
DELAWARE STATE POLICE	:
SERGEANT MARK DIJIACOMO, BECKY	:
BARRETT-TOOMEY, and ELLEN MELROSE,	:
	:
Defendants.	:
-----X	

Civil Action No. 06-359 (GMS)

JURY TRIAL DEMANDED

NOTICE OF DEPOSITION

TO:	Ralph K. Durstein III, Esquire Deputy Attorney General Carvel State Office Building 820 N. French Street, 6 th Floor Wilmington, Delaware 19801	Walter Nalducci, Esquire Cutruzzula & Nalducci 3300 Grant Building Pittsburgh, PA 15219
	Becky Barrett-Toomey 5355 Library Road Bethel Park, PA 15102	Ellen Melrose 1452 Beechwood Boulevard Pittsburgh, PA 15217

PLEASE TAKE NOTICE that plaintiffs will take the deposition upon oral examination of Becky Barrett-Toomey on Wednesday, February 28, 2007 at 1:30 p.m. at the offices of Rosenthal, Monhait & Goddess, P.A., 919 Market Street, Suite 1401, Citizens Bank Center, Wilmington, Delaware 19801, before an officer authorized by law to administer oaths. Testimony shall be recorded by stenographic means.

The deposition shall continue from day to day until completed. You are invited to attend and participate.

ROSENTHAL, MONHAIT & GODDESS, P.A.

By: 

Norman M. Monhait (#1040)
919 Market Street, Suite 1401
Citizens Bank Center
P.O. Box 1070
Wilmington, Delaware 19899-1070
(302) 656-4433
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HANGLEY ARONCHICK SEGAL & PUDLIN

Gordon A. Einhorn (Admitted *pro hac vice*)
Paul W. Kaufman (Admitted *pro hac vice*)
30 N. Third Street, Suite 700
Harrisburg, PA 17101
(717) 364-1004

OF COUNSEL: Attorneys for Plaintiffs

**AMERICAN CIVIL LIBERTIES UNION
OF PENNSYLVANIA**

Mary Catherine Roper
P.O. Box 40008
Philadelphia, PA 19106

Witold Walczak
313 Atwood Street
Pittsburgh, PA 15213

Seith Kreiner
3400 Chestnut Street
Philadelphia, PA 19104

**AMERICAN CIVIL LIBERTIES UNION
OF DELAWARE**

Julia Graff (#4708)
100 W. 10th Street, Suite 309
Wilmington, Delaware 19801

February 20, 2007

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of February, 2007, a copy of **Notice Of Deposition Of Becky Barrett-Toomey** was served, by electronic filing, upon:

Ralph K. Durstein III, Esquire
Deputy Attorney General
Carvel State Office Building
820 N. French Street, 6th Floor
Wilmington, Delaware 19801

by facsimile and first class mail, postage prepaid, upon:

Walter Nalducci, Esquire
Cutruzzula & Nalducci
3300 Grant Building
Pittsburgh, PA 15219

and by Federal Express, upon:

Becky Barrett-Toomey
5355 Library Road
Bethel Park, PA 15102

Ellen Melrose
1452 Beechwood Boulevard
Pittsburgh, PA 15217

A handwritten signature in black ink, appearing to read "Norman M. Monhait", written over a horizontal line.

Norman M. Monhait (#1040)